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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS BOLDT TO PUBLIC REPRESENTATIVE INTERROGATORIES PR/USPS-T1-11 AND 12

The United States Postal Service hereby provides the responses of witness

James Boldt to the above-listed interrogatories of the Public Representative dated

August 5, 2011. Each interrogatory is stated verbatim and followed by the response.

Responses to PR/USPS-T1-10 and 13(a) and (f) are forthcoming. Objections to

PR/USPS-T1-13(b)-(e) are being filed.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BOLDT TO PUBLIC REPRESENTATIVE INTERROGATORY

PR/USPS-T1-11

Please confirm that the calculation of walk-in revenue in USPS-LR-NP2 does not include revenue from any First Class Presort Mail, Standard Mail, or Periodicals Mail.

RESPONSE

Confirmed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BOLDT TO PUBLIC REPRESENTATIVE INTERROGATORY

PR/USPS-T1-12

Can First Class Presort Mail, Standard Mail, or Periodicals Mail be entered and paid for at any of the postal retail facilities listed in USPS-LR-NP2 file "Basket Analysis by UFN.xls" or "USPS-LR-N2011-1_NP2 Revenue Distribution for LT100K Locations - Pie Chart.xls"? If so, please explain why this revenue has not been included.

RESPONSE

It can be entered at many, if not all of those facilities. However, see the response to DBP/USPS-30, which explains why it is not counted as retail revenue.